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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MOHAMMED THANI A.T. AL THANI,	<u>Case No.: 20-cv-4765 (VEC)</u>
Plaintiff,	DECLARATION
-against-	<u>OF THOMAS H. HERNDON, JR.</u>
ALAN J. HANKE, IOLO GLOBAL LLC,	
AND JOHN DOES 1-100,	
Defendants.	

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Thomas H. Herndon, Jr., Esq., an attorney duly licensed to practice law in the State of New York and before this Court, under penalties of perjury declares as follows:

1. I am a member of Brooks, Berne & Herndon PLLC, attorneys for defendants, Alan J. Hanke (“Hanke”) and IOLO Global LLC (“IOLO”) (Hanke and IOLO are sometimes collectively referred to herein as, the “Defendants”), in the above action. As such, I am fully familiar with the facts and circumstances stated herein.

2. I respectfully submit this declaration solely to place before the Court:

(a) The Complaint filed by Plaintiff against Defendants in this action on June 22, 2020 (**Exhibit “A”**);

(b) The August 5, 2020 letters from the undersigned to Plaintiff's counsel
(Exhibits "B" and "C"); and

(c) The August 7, 2020 Order (Memo Endorsed) **(Exhibit "D")**.¹

Dated: New York, New York
August 26, 2020



THOMAS H. HERNDON, JR.

¹ Initially, Plaintiff sought one amount for legal fees and has now sent over a redacted bill. We are reviewing and will meet-and-confer. If we are unable to come to an agreement, we will request a conference concerning the same or discuss at the conference.